



MONTANA
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December 6, 2004

Surface Transportation Board
Case Control Unit
Washington, DC 20423
STB Docket No. FD 30186 (Sub-No. 3)

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To Whom It May Concern:

We write to express concern over the proposed Western Alignment of the Tongue River Railroad (TRR III). As an organization that represents statewide interests in preserving the culture and heritage of Montana, MPA has been involved in issues in the valley for the past few years. And we are urgently concerned that the Tongue River Valley, and the Native American and traditional ranching communities that live there, not be sacrificed to the interests of energy and railroading.

The Tongue River Valley is well known as a region of high cultural and historic significance, on local, state and national levels. Thousands of years of history are reflected in the drainage by a high density of sites that reflect the diverse human history in the valley. From the pre-contact period, rock art, buffalo jumps, fasting beds, tipi rings, medicine wheels, burial sites, rock quarries and vision sites comprise a rich physical record of the ancient history of the region's *First Peoples*. From the late 19th - early 20th century settlement period, family farms and ranches with a wealth of stone, log and wooden buildings reflect more than a century of agriculture along the Tongue River. And from the latter 19th century, there are battlefields and other sites that reflect the turbulence of cultural migrations and conflict, both between indigenous cultures, and between Plains tribes and the US Army.

Among the latter are such nationally-exceptional sites such as those associated with the Great Sioux Wars campaign of 1876-77. As the U.S. Army pursued the Sioux and Cheyenne from Rosebud Battlefield to Little Big Horn and on to the Wolf Mountains, they came directly through this valley. Sites of National Historic Landmark significance such as the Wolf Mountains Battlefield may well lie directly within the proposed railroad corridor.

Remote and undisturbed, the sites within the Tongue River valley retain exceptional levels of preservation and integrity. With a way of life uninterrupted by modern intrusions, the Tongue River landscape has changed little over time. Today, a 90-mile gravel road is still the only travel route through the valley, the land is unbroken, traditional native sites are still in use, and historic ranches remain within the original families who are raising cattle and horses in patterns unbroken since the settlement of these western plains.

With this in mind, it is imperative that cumulative effects of all proposed undertakings within the valley be studied together, for the impacts will be considerable. This includes the comprehensive impact of the entire railroad project, not just the western alignment. As well, the impacts of energy development must be included in that evaluation. With coalbed methane leases issued throughout the valley by BLM and

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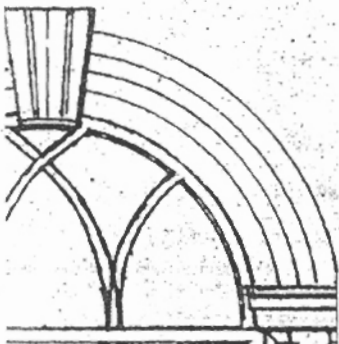
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other agencies, and additional leases soon by the Custer National Forest, the entire landscape is threatened by widespread industrialization.

An overview of the historic themes and contexts for the valley has yet to be developed. This level of documentation, along with anticipated property types and potential historic districts is critical to ensure adequate protection of public resources in the valley. A tool of this nature would facilitate responsible cultural resources management and avoid undue impacts to sensitive historic and cultural sites.

And finally, the potential impacts to cultural resources and the lives of people in this valley must be weighed against the plan to build this rail line. Meaningful alternatives must be explored in an open public process that allows the people of this valley and of Montana to have a meaningful voice in their future.

Thank you for the opportunity to comment,

Chere Jiusto
Executive Director

